

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Advanced Gritings Incorporated  
Address: 2300 NE Independence Avenue  
Lee's Summit, MO 64064  
EPA ID Number: MOR 000513309 Date: 01/29/2015

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation	Description of Violation
D) 40 CFR 262.11	Hazardous waste determination not conducted
(A) Booth #1 - 24 <sup>hrs</sup> spent Filters every 3 months	(A) 48 spent paint booth Filters every 2 months 01/29/15
(B) Booth #2 - 20 spent Filters month	(B) 45 spent paint booth Filters every 3 months
(C) Booth #3 - 40 spent Filters every 2 1/2 months	(C) 15 spent powder coat booth Filters every 3 months year
C2 - Powder Booth - 30 spent Filters per year	(D) 5 spent sanding pads per day
	(E) 3 waste paint gun cups per day
	(F) Waste masking material, PPE and mixing sticks (quantity not determined)
	(G) 1 bag of waste powder coat per day
	(H) 40 gallons of waste seal coat every 6 months
	(I) 150 gallons of GF Phos 75766 wash every 6 months
	(J) 55 gallons of Wash unit rinse water per month

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII  
Environmental Sciences and Technology Division  
300 Minnesota Avenue  
Kansas City, KS 66101  
ATTN: Michael S. Martin

If you have any questions about this Notice, or wish to discuss your response, you may call me at  
(913) 551-7149, or Berla Jackson-Johnson (Compliance Officer) at  
(913) 551-7720.

This Notice prepared by Michael S. Martin Date: 01/29/2015

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Texas Zink Date: 1-29-15  
Signature: Texas Zink  
Title: Production Manager

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
EPA ID Number: \_\_\_\_\_ Date: \_\_\_\_\_

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Citation

Description of Violation

- (K) Two 55-gallon drums of waste paint/waste solvent  
(possibly double in addition to F003+ F005) ev. / b/mnth  
(L) 10 spent waste solvent rags per day  
(M) 1800 Dry Area  
1. One  $\frac{3}{4}$  Full 10-gallon drum of hardened paint  
2. One  $\frac{3}{4}$  Full 5-gallon pail of SpecterChrom QT-100 paint  
3. One  $\frac{3}{4}$  Full 5-gallon pail of semi-solid paint  
4. 10 1-gal pails of Incon 2.1 Satin Plus paint  
5. 1 1-gallon pail of Carboline Zinc Filler Type 2  
6. 1 1-gallon container of Powder Coat Paint Dissolver

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U. S. Environmental Protection Agency, Region VII

ATTN: \_\_\_\_\_

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This Notice prepared by Michael S. Martin Date: 01/29/2015

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

Signature:

Title:

TRANS Zink

Date: 1-29-15

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ATTACHMENT 6 Page 2 of 9

Notice of Violation Pursuant to Requirements  
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TO: Facility Name: \_\_\_\_\_  
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Citation

Description of Violation

_____	(N) Area outside the 100 Down Area
_____	1. One open 55-gallon drum of wash unit rinse water
_____	(10-15 gallons full)
_____	2. Two full 55-gallon drums of wash unit rinse water
_____	3. One 55-gallon drum of UltraGuard and wash unit
_____	rinse water (Full)
_____	4. One 55-gallon drum of Chemseal 59 and wash
_____	unit rinse water (Full)
_____	
_____	(D) Paint Booth #2
_____	1. One 3/4 Full 1-gallon pail of hardened black
_____	paint (pail open)

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U. S. Environmental Protection Agency, Region VII

ATTN: \_\_\_\_\_

If you have any questions about this Notice or wish to discuss your response, you may call me at \_\_\_\_\_, or \_\_\_\_\_ (Compliance Officer) at \_\_\_\_\_.

This Notice prepared by

Michael J. Martin

Date:

01/29/2015

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

TRAVIS ZILIK

Date:

1-29-15

Signature:

[Signature]

Title:

Production Manager



Notice of Violation Pursuant to Requirements  
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TO: Facility Name: \_\_\_\_\_  
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Citation

Description of Violation

<u>Citation</u>	<u>Description of Violation</u>
	(P) Wash Unit Area
	1. Four 55-gallon drums of wash unit rinse water
	(Q) 50 spent fluorescent lamps generated per year
	(150 lamps in last 3 years)
2) 10 CSR 25-5.262(2)(A)3.B	Notification not up to date (change of site contact)
3) 10 CSR 25-5.262(1) incinerating	Storage containers not kept closed → 180 Day Area
40 CFR 262.34(d)(2)	- One 55-gallon drum of waste paint
40 CFR 265.173(n)	- One 55-gallon drum of white solvent

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U. S. Environmental Protection Agency, Region VII

ATTN: \_\_\_\_\_

If you have any questions about this Notice or wish to discuss your response, you may call me at \_\_\_\_\_, or \_\_\_\_\_ (Compliance Officer) at \_\_\_\_\_

This Notice prepared by

Michael J. Martin

Date:

01/29/2015

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

TRAVIS ZILK

Date:

1-27-15

Signature:

Travis Zilk

Title:

Production Manager

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
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Citation	Description of Violation
4) 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) → 40 CFR 262.34(a)(2)	Accumulation date not marked on storage container - One 55-gallon drum of waste paint (WDDA Area)
5) 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) → 40 CFR 262.34(a)(3)	Storage container not labeled with the words "Hazardous Waste" - Same drum in Citation #4
6) 10 CSR 25-5.262(2)(c) 2.C(1)(ii) → 40 CFR 262.34(d) → 40 CFR 265.174	Weekly hazardous waste inspections not conducted.

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U. S. Environmental Protection Agency, Region VII

ATTN: \_\_\_\_\_

If you have any questions about this Notice or wish to discuss your response, you may call me at \_\_\_\_\_, or \_\_\_\_\_ (Compliance Officer) at \_\_\_\_\_.

This Notice prepared by

Michael S. Martin

Date:

01/29/2015

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

TRAVIS Zink

Date:

1-21-15

Signature:

Travis Zink

Title:

Production Manager

Notice of Violation Pursuant to Requirements  
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TO: Facility Name: \_\_\_\_\_  
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Citation	Description of Violation
7) 10 CSR 25-5.262(2)(c) 2.C(11)	Daily inspections of areas subject to spills not conducted.
B) 10 CSR 25-5.262(1) → 40 CFR 262.34(a)(4) → 40 CFR 265.33	Adequate aisle space not maintained at the 180 Day Area.
9) 10 CSR 25-5.262(1) → 40 CFR 262.34(c)(1)(ii) → 10 CSR 25-5.262(2)(c) 3	Satellite containers not marked identifying its contents and beginning date of accumulation → Satellite Area - One 34 full 5-gallon pail of waste paint (partially labeled) - One 34 full 5-gallon pail of waste solvent

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This Notice prepared by Michael S. Martin Date: 01/29/2015

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Travis Zuk Date: 1-29-15  
Signature: [Signature]  
Title: Production Manager



Notice of Violation Pursuant to Requirements  
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Citation	Description of Violation
10) 10 CSR 5-5.262(1) → 40CFR 262.34(d)(4) → 40CFR 265.33	Communication/emergency equipment (air horn) not maintained
11) 10 CSR 25-5.262(1) → 40CFR 262.34(d)(5)(i)(A)	Emergency coordinator's name and phone number not posted next to phones near the Dry Area
12) 10 CSR 25-5.262(1) → 40CFR 262.34(d)(5)(i)(B)	The location of fire extinguishers and spill control equipment not posted next to a phone near the Dry Area

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U. S. Environmental Protection Agency, Region VII

ATTN: \_\_\_\_\_

If you have any questions about this Notice or wish to discuss your response, you may call me at \_\_\_\_\_, or \_\_\_\_\_ (Compliance Officer) at \_\_\_\_\_.

This Notice prepared by

Michael S. Martin

Date:

01/29/2015

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

TRAVIS Zink

Date:

1-29-15

Signature:

Travis Zink

Title:

Production Manager

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Citation	Description of Violation
13) 10CSR 25.5.262(1) → 40CFR 262.34(d)(5)(iii)	Employees not familiar with waste handling and emergency procedures
14) 10CSR 25.5.262(1) → 40CFR 262.34(d)(4) → 40CFR 265.37(a)(1)	Arrangements not made to familiarize the police, fire department, and emergency response agencies with the layout of the Facility, practices of waste handled, associated hazards, places where personnel normally work, entrances to the facility, and evacuation routes.
15) 10CSR 25.5.262(1) → 40CFR 262.34(d)(4) → 40CFR 265.37(a)(2)	Agreements had not been made with State Emergency Agencies, emergency response contractors, and equipment suppliers.

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ATTN. \_\_\_\_\_

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This Notice prepared by Michael J. Martin Date: 1/29/2015

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: TRANS ZILKA Date: 1-29-15  
Signature: [Signature]  
Title: Production Manager



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Citation	Description of Violation
16) 10 CSR 25-5.262(1) → 40 CFR 262.34(a)(4) → 40 CFR 265.37(a)(4)	Arrangements to familiarize local hospitals with the properties of hazardous waste handled and the types of injuries/illnesses that could result from fires, explosions, or release at the facility had not been made.
17) 10 CSR 25-5.262(1) → 40 CFR 262.20	Failure to use the manifest system for the off-site disposal of F003/F005 rags (10 rags per day) in the general trash.
18) 10 CSR 25-7.268(1) → 40 CFR 268.7(c)(2)	(Pre-time limit disposal restriction (LISR) notification not on file for the 2012-2014 Uniform Hazardous Waste Manifests.

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This Notice prepared by Michael S. Martin Date: 01/29/2015

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Traus Zink Date: 1-29-15  
Signature: Traus Zink  
Title: Environmental Manager